

Holland N. O'Neil (TX 14864700)
Stephen A. Jones (TX 24101270)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201
Telephone: (214) 999-3000
Facsimile: (214) 999-4667
honeil@foley.com
sajones@foley.com

**COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
Tubular Synergy Group, LP, <i>et al.</i> , ¹	§	24-80056-swe11
	§	
Debtors.	§	(Jointly Administered)
	§	

**AGENDA FOR MATTERS SCHEDULED FOR
HEARING TO BE HELD ON OCTOBER 24, 2024, AT 2:30 P.M.**

Tubular Synergy Group, LP (“TSG”) and OCTG Connections, LLC (“OCTG”), as debtors and debtors in possession (collectively, the “Debtors”) hereby file their agenda for the matters set for the hearing scheduled for **October 24, 2024, at 2:30 p.m. (CDT)**, before the before the Honorable Scott W. Everett, U.S. Bankruptcy Judge for the Northern District of Texas, in Courtroom 3 on the 14th Floor at 1100 Commerce Street, Dallas, TX 75242 OR **via WEBEX** (the “Hearing”). The following matters have been set for the Hearing:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal identification number are: Tubular Synergy Group, LP (3375) and OCTG Connections, LLC (2025). The Debtors’ address is 8117 Preston Road, Suite 600, Dallas, TX 75225.

I. Matters to be Heard:

A. Debtors' Emergency Motion for Entry of an (I) Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling a Bid Deadline, Auction, and Sale Hearing and Approving the Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; (II) Order Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, and Interests; and (III) Granting Related Relief [Docket No. 170; Filed on 8/30/24]

i. Related Documents:

1. *Order Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling a Bid Deadline, Auction, and Sale Hearing and Approving the Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof* [Docket No. 209] ("**Bidding Procedures Order**");
2. *Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment of Proposed Cure Amounts* [Docket No. 214] ("**Cure Notice**");
3. *Amended Notice of Bid Deadline, Auction, Sale Hearing* [Docket No. 217] ("**Sale Notice**");
4. *Notice of Filing of Proposed Form of Sale Order* [Docket No. 244] ("**Proposed Sale Order**");
5. *Notice of Proposed Stalking Horse Asset Purchase Agreement* [Docket No. 247] ("**Stalking Horse Notice**");
6. *Asset Purchase Agreement* [Exhibit A to Stalking Horse Notice, filed at Docket No. 247];
7. *Notice of Auction Results and Designation of Successful Bidder* [Docket No. 255] ("**Notice of Auction Results**");
8. *Declaration of Scott Webb in Support of Debtors' Motion for Entry of (I) an Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling a Bid Deadline, Auction, and Sale Hearing and Approving the Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; (II) an Order Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, and Interests; and (III) Related Relief* [Docket No. 263] (the "**Webb Declaration**");

9. *Declaration of W. Byron Dunn, Sr. in Support of Debtors' Motion for Entry of (I) an Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling a Bid Deadline, Auction, and Sale Hearing and Approving the Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; (II) an Order Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, and Interests; and (III) Related Relief [Docket No. 264] (the "Dunn Declaration");*
 10. *Declaration of Arish Gupta in Support of Debtors' Motion for Entry of (I) an Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling a Bid Deadline, Auction, and Sale Hearing and Approving the Form and Manner of Notice Thereof, and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; (II) an Order Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, and Interests; and (III) Related Relief [Docket No. 267];*
 11. *Notice of Filing of Revised Proposed Sale Order [Docket No. 268];*
 12. *Notice of Proposed Asset Purchase Agreement with Centric Pipe, LLC [Docket No. 269] (the "Final APA Notice"); and*
 13. *Asset Purchase Agreement [Exhibit A to Final APA Notice, filed at Docket No. 269-1].*
- ii. Response Deadline: October 21, 2024.
- iii. Responses:
1. *Limited Objection of KBSIII Preston Commons, LLC [Docket No. 260].*
- iv. Status: This matter will go forward. The Debtors received one formal objection and reservation of rights concerning this matter, which was filed by the lessor for the leases to which the Debtors are parties. However, at the Hearing, the Debtors do not intend to seek the Court's approval of the assumption or assignment of any executory contracts or unexpired leases related to the proposed sale of the Debtors' assets. Accordingly, the Debtors believe that the Court can consider the objection resolved and/or moot at this time. The Debtors conferred with counsel for the Lender, the Committee, certain state and local taxing authorities, and the proposed purchaser of the Debtors' assets regarding the terms and provisions of the original proposed sale order [Docket No. 244]. The Debtors addressed and incorporated all comments received from the foregoing parties into a revised proposed sale order. [See Docket No. 268]. Accordingly, the

Debtors will seek entry of the revised proposed sale order at the Hearing.
[See Docket No. 268].

B. Debtors' Emergency Motion to Extend the Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof [Docket No. 238; Filed on 10/9/24]

- i. Related Documents:
 1. *Notice of Hearing* [Docket No. 239];
 2. *Amended Notice of Hearing* [Docket No. 243]; and
 3. *Second Amended Notice of Hearing* [Docket No. 246].
- ii. Response Deadline: October 21, 2024.
- iii. Responses: None.
- iv. Status: This matter will go forward. No formal objections were filed, and the Debtors received no informal comments to the motion or proposed order. The Debtors conferred with counsel for the Lender and the Committee prior to filing the motion and proposed order. Neither the Lender nor the Committee opposed the motion or proposed order. Accordingly, the Debtors will seek entry of the proposed order, as originally filed with the motion, at the Hearing.

C. Debtors' Emergency Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending Period Within Which the Debtors Must Assume or Reject Purported Unexpired Leases of Nonresidential Real Property [Docket No. 242; Filed on 10/11/24]

- i. Related Documents:
 1. *Amended Notice of Hearing* [Docket No. 243];
 2. *Second Amended Notice of Hearing* [Docket No. 246]; and
 3. *Notice of Filing of Revised Proposed Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending Period Within Which the Debtors Must Assume or Reject Purported Unexpired Leases of Nonresidential Real Property* [Docket No. 265].
- ii. Response Deadline: October 21, 2024
- iii. Responses: None.
- iv. Status: This matter will go forward. The Debtors negotiated the terms of a revised proposed order with counsel for the lessor for the leases to which the Debtors are parties. The Debtors filed a notice of the revised proposed

order reflecting the parties' agreement [See Docket No. 265] and will seek entry of the revised proposed order at the Hearing.

II. Certificates of Service:

- A. Certificate of Service re: Bidding Procedures Order; Sale Notice; Cure Notice [Docket No. 218];
- B. Certificate of Service re: Sale Notice [Docket No. 221];
- C. Supplemental Certificate of Service re: Sale Notice [Docket No. 235];
- D. Certificate of Service re: *Debtors' Emergency Motion to Extend the Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof (Docket No. 238); Notice of Hearing to be held on Thursday, October 24, 2024, at 2:30 p.m. (CDT) (Docket No. 239)* [Docket No. 241];
- E. Certificate of Service re: *Debtors' Emergency Motion for Entry of an Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending Period Within Which the Debtors Must Assume or Reject Purported Unexpired Leases of Nonresidential Real Property (Docket No. 242); Amended Notice of Hearing to be held on Thursday, October 24, 2024, at 2:30 p.m. (CDT) (Docket No. 243); Proposed Sale* [Docket No. 245];
- F. Certificate of Service re: *Second Amended Notice of Hearing to be held on Thursday, October 24, 2024, at 2:30 p.m. (CDT) (Docket No. 246)* [Docket No. 252];
- G. Certificate of Service re: Stalking Horse Notice [Docket No. 253];
- H. Supplemental Certificate of Service re: Bidding Procedures Order; Sale Notice [Docket No. 254];
- I. Certificate of Service re: Notice of Auction Results [Docket No. 258]; and
- J. Certificate of Service re: Dunn Declaration; Webb Declaration; *Notice of Filing of Revised Proposed Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending Period Within Which the Debtors Must Assume or Reject Purported Unexpired Leases of Nonresidential Real Property (Docket No. 265)* [Docket No. 266].

III. Witness and Exhibit Lists:

- A. *Debtors' Witness and Exhibit on October 24, 2024, Hearing* [Docket No. 262]; and
- B. *Debtors' Amended Witness and Exhibit on October 24, 2024, Hearing* [Docket No. 270].

The Debtors reserve the right to amend this *Notice of Agenda* as appropriate.

DATED: October 23, 2024

Respectfully submitted by:

/s/ Stephen A. Jones

Holland N. O'Neil (TX 14864700)

Stephen A. Jones (TX 24101270)

FOLEY & LARDNER LLP

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000

Facsimile: (214) 999-4667

honeil@foley.com

sajones@foley.com

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CERTIFICATE OF SERVICE

I hereby certify that, on October 23, 2024, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Stephen A. Jones

Stephen A. Jones